

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, :

 Plaintiff :

 v. : CIVIL ACTION NO.

SERBAN C. CONSTANTINESCU, :

 Defendant :

COMPLAINT

The United States of America, by its Attorneys, Patrick L. Meehan, United States Attorney in and for the Eastern District of Pennsylvania, and Virginia R. Powel, Assistant United States Attorney for said District, complains of the defendant as follows:

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1345 in that the plaintiff is the United States of America on behalf of its agency, the **DEPARTMENT OF HEALTH AND HUMAN SERVICES**.

2. Venue is properly set pursuant to 28 U.S.C. §1391 in that the plaintiff is complaining of **SERBAN C. CONSTANTINESCU**, residing at 2313 Brookview Place, Elkins Park, PA 19027, a location within this District.

3. Defendant applied for and received Health Education Assistance Loans, which loans were insured by the Department of Health and Human Services pursuant to 42 C.F.R. §294f.

4. Defendant, **SERBAN C. CONSTANTINESCU**, is indebted to plaintiff in the principal amount of \$81,842.65 plus interest through December 20, 2003, in the amount of \$528.83, as set forth in the Certificate of Indebtedness attached hereto as Exhibit "A". Interest continues to accrue at the approximate rate of 4.000%

5. Defendant has failed to pay the aforesaid amount although demand has been made for payment.

WHEREFORE, plaintiff demands judgment against the defendant, **SERBAN C. CONSTANTINESCU**, in the amount of \$82,371.48, plus additional prejudgment interest accruing from December 20, 2003, until judgment as set forth in paragraph (4) above, plus interest on the Judgment at the legal rate, plus costs and other proper relief until paid in full.

Respectfully submitted,

PATRICK L. MEEHAN
United States Attorney

MARGARET L. HUTCHINSON
Assistant United States Attorney

VIRGINIA R. POWEL
Assistant United States Attorney